

IN RE: ZOOM VIDEO
COMMUNICATIONS, INC. PRIVACY
LITIGATION

Case No. 20-cv-02155-LHK (SVK)

**SECOND ORDER REGARDING JOINT
DISCOVERY LETTER BRIEF**

Re: Dkt. Nos. 150, 152, 153

Following this Court's order of February 9, 2021 (Dkt. 152) and today's hearing addressing the remaining issues in the Parties' Joint Discovery Brief (Dkt. 150), the Court

ORDERS as follows:

1. Third Party Software Integrations

a. **Marketplace Apps.** Regarding the tri-level structure proposed by Plaintiffs, as to level 2 referred to as "marketplace apps," Plaintiff identified 24 RFPs pursuant to which it seeks a broad swath of information regarding potentially hundreds of marketplace apps. As such, Plaintiffs' requests are overbroad both as to the information they seek and the universe from which they seek that information. Accordingly, Plaintiffs are to narrow both the specific information they are seeking (e.g., security audit information) and the number of marketplace apps to which they are directing their requests. The Parties are to then meet and confer to reach a compromise on the information to be provided. **If the Parties are unable to compromise, the issue may be included in a joint submission to the Court not to exceed 5 pages by noon on Thursday, February 18, 2021.**

1 **b. SDK Snapshots.** Defendant is to produce the agreed upon SDK snapshots as of
2 February 2020, April 2020, August 2020, and November 2020.

3 **4. Security Misrepresentations¹**

4 **a. End-to-end Encryption.** The Parties are to continue their meet and confer efforts
5 regarding the search terms. For the reasons discussed at the hearing, the term
6 “encrypt!” is too broad and the term “end-to-end” is too narrow. **If the Parties are**
7 **unable to compromise, the issue may be included in a joint submission to the**
8 **Court not to exceed 5 pages by noon on Thursday, February 18, 2021.**

9 **b. Enterprise v. Non-enterprise Customers.** For the reasons discussed at the
10 hearing, Defendant’s response to RFP 17 is properly limited at this time to non-
11 enterprise customers.

12 A hearing on any unresolved issues, if necessary, will be held on **Tuesday, February 23,**
13 **2021 at 10:00 a.m.**

14 **SO ORDERED.**

15 Dated: February 16, 2021

16
17 
18 SUSAN VAN KEULEN
19 United States Magistrate Judge

20
21
22
23
24
25
26
27
28 ¹ The remaining disputes are numbered as in Dkts. 150, 152.